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(Dorrie  
J. Roman)

September 6, 2005

Mr. John F. Carter  
Regional Director  
Federal Deposit Insurance Corporation  
25 Jessie Street at Ecker Square, Suite 2300  
San Francisco CA 94105

2005 SEP 12 AM 10:33

Dear Mr. Carter:

I have been following the progress of Walmart's application for an industrial banking charter and for federal deposit insurance. Given the influence Walmart exerts over other industries, I have reservations about the amount of control Walmart will ultimately gain within the banking industry if successful in this endeavor.

The scenario that I see developing if Walmart is allowed to squeeze the banking industry in the same fashion that it has retailers who supply household products, clothing, electronics, lawn and garden equipment, pharmacy items, automotive service, gasoline, optometry etc.....

What is to prevent Walmart from requiring its suppliers to maintain banking relationships with Walmart?

What is to prevent Walmart from providing its suppliers with more favorable credit terms than is available to its non-suppliers?

What incentive will Walmart have to loan money to its competitors? In lieu of a current income stream, would there be more of an incentive to see those competitors fail, because of a lack of credit availability?

If I understand correctly, as an industrial bank, Walmart would not be subject to the same supervision and restrictions as commercial banks. Will this ultimately pose an unacceptable risk to the FDIC insurance fund? The FDIC fund was ravaged in the recent past, requiring the banking community to come to the aid of the Savings and Loan industry. For a period of several years, Wayne Bank, with assets of \$80 million at the time, saw its FDIC premiums increase from \$15,000 annually to \$125,000 per year. I hope I do not experience another such dismal affair in my lifetime, but allowing an enterprise the size of Walmart under the FDIC umbrella may well set the stage.

As a member of a small town Chamber of Commerce, I am aware of the challenges we face to keep our downtown area and our small businesses intact and healthy. As more and more services move under one roof, we see more and more vacant storefronts. If past

MEMBER F.D.I.C.

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experience is in any way an indicator of future trends, I cannot see how the public will be served by less competition in the financial arena. I am not saying that a competitive marketplace is undesirable, but I believe that a company with such far-reaching influence will have the ability to rewrite the rulebook as soon as they are allowed in the game.

If it fits with your schedule, I would appreciate a reply from you, by letter or email to [lcrull@waynebnk.com](mailto:lcrull@waynebnk.com). I hope you agree that mixing banking and retail commerce, and exposing the FDIC fund to potential enormous risk, is not in the best interests of anyone except Walmart.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Leroy E. Crull", written over the word "Sincerely,".

Leroy E. Crull  
Senior Vice President and Controller